

<b>JERRY BLASINGAME</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>CIVIL ACTION</b>
<b>v.</b>	)	<b>FILE NO: 1:19-CV-2047-SCJ</b>
	)	
<b>OFFICER J. GRUBBS, #6416; and</b>	)	
<b>CITY OF ATLANTA/ATLANTA</b>	)	
<b>POLICE DEPT.</b>	)	
	)	
<b>Defendants.</b>	)	

**COMES NOW**, Defendant City of Atlanta (the “City”) pursuant to FED. R. Civ. P. 56 and Local Rule 56 and hereby responds to Plaintiff’s Statement of Undisputed Material Facts as follows:

1. Movant's fact No. 1 is not material and does not comply with LR 56.1(B)(1).
2. No objection.
3. Objection to "[a]s a result of Defendant Grubbs tasing Mr. Blasingame, Mr. Blasingame fell to forward down a hill, causing his head to strike the concrete pad of a traffic control box" as argumentative and goes to the

issue of causation. Also, the sentence “Defendant Grubbs was concerned Mr. Blasingame would stop breathing and potentially die on the scene” listed in Movant’s fact No. 3 is not material. Finally, Movant’s fact No. 3 does not comply with LR 56.1(B)(1).

4. Movant’s citation does not support No. 4 fact.
5. Objection as argumentative and goes to the issue of causation. Movant’s citation does not support No. 5 fact.
6. Movant’s citation does not support No. 6 fact.
7. Movant’s fact No. 7 is not material.
8. Movant’s citation does not support No. 8 fact.
9. Objection as argumentative and goes to the issue of causation. Movant’s citation does not support No. 9 fact.
10. Movant’s citation does not support No. 10 fact.

Respectfully submitted this 17th day of May 2021.

/s/ Alisha Marie S. Nair  
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